

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Kevin Corcoran and Beverly L.  
Corcoran,

Debtor(s)

Chapter 13

Case No. 19-14500-elf

Select Portfolio Servicing, Inc. as servicing  
agent for Wells Fargo Bank, National  
Association, as Trustee for the SACO I Inc.  
Mortgage Pass-Through Certificates Series  
1999-3,

Movant,

Hearing Date: March 10, 2020

Time: 9:30 a.m.

Location: Courtroom 1

Kevin Corcoran and Beverly L. Corcoran,  
Debtor(s) / Respondent(s),

and

William C. Miller, Esq.,

Trustee / Respondent

\* \* \* \* \*

NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE

Select Portfolio Servicing, Inc. as servicing agent for Wells Fargo Bank, National Association, as Trustee for the SACO I Inc. Mortgage Pass-Through Certificates Series 1999-3 has filed Motion for Relief from the Automatic Stay with the Court for leave to enforce its rights as determined by state and/or other applicable law with regard to real property.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before February 28, 2020, you or your attorney must do all of the following:

(a) file an answer explaining your position at:

United States Bankruptcy Court  
Eastern District of Pennsylvania  
Office of the Clerk  
900 Market Street  
Suite 400  
Philadelphia, PA 19107

(b) mail a copy to the Movant's attorney:

Andrew M. Lubin, Esquire  
Milstead & Associates, LLC  
1 E. Stow Road  
Marlton, NJ 08053  
Phone No.: (856) 482-1400  
Fax No.: (856) 482-9190

(c) mail a copy to the Chapter 13 Trustee:

William C. Miller, Esq., Trustee  
P.O. Box 1229  
Philadelphia, PA 19105

2. If you or your attorney do not take the steps described in paragraphs 1(a), 1(b) and 1(c) above and attend the hearing, the court may enter an order granting the relief requested in the Motion.

3. A hearing on the motion is scheduled to be held before the Honorable Eric L. Frank on March 10, 2020, at 9:30 a.m. in 900 Market Street, Suite 400, Philadelphia, PA 19107.

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2970 to find out whether the hearing has been cancelled because no one filed an answer to the Motion.

Respectfully submitted,  
MILSTEAD & ASSOCIATES, LLC

DATED: February 11, 2020

/s/Andrew M. Lubin  
Andrew M. Lubin, Esquire  
Attorney ID No. 54297  
1 E. Stow Road  
Marlton, NJ 08053  
(856) 482-1400  
Attorneys for Movant